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6 Email: amirhossein.jaberzadeh@gmail.com
7 **Defendant/Counterclaimant**

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

7 AMERICAN HEART TECHNOLOGIES,
8 LLC, a Delaware limited liability
9 company; HEARTLUNG
10 CORPORATION, a Delaware
11 Corporation.,

Plaintiffs,

v.

AMIRHOSSEIN JABERZADEH
ANSARI aka AMIR JABERZADEH, an
Individual; and DOES 1 – 10,

Defendants.

Case No. 2:22-cv-08387-MEMF-RAO

**AMENDED JABERZADEH
DECLARATION IN SUPPORT OF
MOTION FOR ATTORNEY FEES**

DATE: JUNE 05, 2025
TIME: 10:00AM

RELATED COUNTER-ACTION

I, Defendant Jaberzadeh, do hereby declare and state as follows:

1. I am a pro se litigant in this case.
2. This Declaration is in support of the Defendant's motion for attorney fees in the above-captioned matter.
3. The statements made in this Declaration are based on the knowledge acquired by me before and during discovery of this case.
4. After this honorable court's ruling on April 21, 2025, I have made reasonable efforts to obtain detailed billing records and supporting documentation from the attorney's that I have retained or consulted regarding the legal fees incurred in this matter.
5. I have retained Mr. ALAIN V. BONAVIDA after I was served with this lawsuit between December 2022 and April 2023. During this time, I paid a total of \$8865 with details provided in exhibit 1.
6. Later I substituted Mr. BONAVIDA with AIDIN GHAVIMI between April 2023 and April 2024. Mr GHAVIMI initially requested for a non-refundable \$10000 retainer. After January 2024, Mr. GHAVIMI billed me 3 more times with the total of \$5291.5 (Exhibits 2-4). After the initial court judgment, I have requested Mr. GHAVIMI's hours and hourly rate which is amended as exhibit 12. The total number of hours Mr. GHAVIMI spent in this lawsuit is 91.5 hours with an hourly rate of \$475 which is calculated to be \$43,462.5. I was waiting for Mr. GHAVIMI'S response since April 24th, 2025.
7. Since I could not afford to continue paying my attorney, I decided to save costs by representing myself and only consult with attorneys as I needed on my way. Since the beginning of summer 2024, I have hired attorneys to help me draft motions and help me with federal rules of civil procedure and evidence. During this time I paid \$695 to STEVEN VONDRAN for more than 2 hours of consultation (exhibit 7) and \$750 to PETER LIVELY for 2.5 hours of

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2 consultation (exhibit 8) on how to defend trade secrets claims. I then paid
3 \$1900 to JARED WICHNOVITZ for 15 hours for assisting motion for
4 summary judgement (exhibit 9) on dismissing Plaintiff's claims, \$1062.49 to
5 PEARLETTE V. TOUSSANT for 8.5 hours of assisting my motion to compel
(exhibit 10) for Plaintiffs refusing forensically inspecting Plaintiff's computers
for their Trade secret claims.

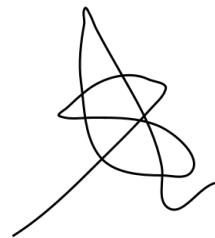
- 6 8. In total, I am requesting \$56,734.99 in attorney fees. I paid \$1749 for the
7 expert witness (exhibit 11) to fight back Plaintiff's trade secret claims and also
8 \$1620 for Naghavi's deposition videographer (exhibit 2) which was not
covered in the bill of costs.

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10 I declare under penalty of perjury of the laws of the United States of America that the
foregoing is true and correct.

11 DATED: May 08, 2025

Amir Jaberzadeh, Pro Se

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14 By:



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Amir Jaberzadeh, Defendant/Counter Claimant